

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

LATHAM & WATKINS LLP,) Civil Action No. 1:17-cv-01368-LMB-JFA
Plaintiff,)
v.)
HIRING-LW.COM,)
Defendant.)

)

**DECLARATION OF BERT C. REISER IN SUPPORT OF LATHAM & WATKINS
LLP'S MOTION FOR DEFAULT JUDGMENT**

I, Bert C. Reiser, declare as follows:

1. I am an attorney with the law firm of Latham and Watkins LLP, counsel for Plaintiff in this action. I am an attorney licensed to practice law in the State of Virginia and am in good standing. My current office address is 555 Eleventh Street, NW, Suite 1000, Washington, D.C. 20004, and my office phone number is (202) 637-2200.

2. I submit this declaration in support of Latham & Watkins LLP's Motion for Default Judgment against Defendant hiring-lw.com. The facts set forth below are within my personal knowledge, to which I could and would testify competently if called upon to do so.

3. As set forth in my March 29, 2018 declaration (ECF No. 16), Latham & Watkins has complied with the Court's March 16, 2018 Order (ECF No. 14), including by causing a copy of this Court's Order (ECF No. 14) to be published in The Washington Post on March 22, 2018. No party has contacted me in relation to the Order or to defend against this suit.

4. As reflected in its Complaint (ECF No. 1 ¶ 15), Latham & Watkins is the owner of multiple U.S. Trademark Registrations, including Nos. 2413795, 4986824, 4976906, and

4968228. The table below sets forth the registration dates and descriptions of goods and services related to those registrations:

Trademark	Reg. No. Reg. Date	Description of Goods & Services
LATHAM & WATKINS	2413795 12/19/00	IC 042: Providing information in the field of law via a website on global computer networks and legal services.
LATHAM & WATKINS	4976906 6/14/16	IC 035: advisory services relating to business management and business operations; business assistance, management and information services; business management consultancy services; business records management services relating to business entity formation and associated state reporting requirements; new business venture development and formation consulting services; business acquisition and merger consultation; providing electronic tracking of intellectual and industrial property assets to others for business purposes; consulting services in the field of managing intellectual properties; providing an online searchable database featuring business information that features a glossary of business terms; business networking services; business consulting and advising services pertaining to business sales, mergers, acquisitions and business valuations; business management consulting and advising services in the field of mergers and acquisitions, bankruptcy and financing; consulting and advising services in the field of tax; arranging and conducting of business conferences in the fields of business and law. IC 036: financial consulting and advising services pertaining to business sales, mergers, acquisitions and business valuations; financial consulting and advising services in the fields of mergers and acquisitions, tax, bankruptcy, real estate, and financing.
LATHAM & WATKINS	4968228 5/31/16	IC 041: arranging and conducting of educational conferences and seminars in the fields of business and law; providing online publications in the nature of e-books in the fields of business and law; providing online non-downloadable videos featuring information and instruction in the fields of business and law; providing online non-downloadable newsletters and articles in the fields of business and law; online non-downloadable videos in the fields of business and law. IC 045: legal services; consulting in the field of intellectual property licensing; providing information and advisory services in the fields of business law, environmental law, litigation, and intellectual property; providing an online searchable database in the legal services field featuring a glossary of legal terms.
LATHAM & WATKINS	4986824 6/28/16	IC 009: downloadable publications in the nature of newsletters and articles in the fields of business and law; downloadable software applications for mobile devices which provide a glossary of business and legal terms; downloadable electronic publications in the nature of e-books in the fields of business and law; downloadable software and mobile application software for conducting legal research in the field of antitrust issues; downloadable software and mobile application software providing an interactive database of terminology, hyperlinks, and a summary of legal information in the field of antitrust issues. IC 016: printed publications, namely, glossaries, and reference materials in the nature of books, pamphlets, and brochures in the fields of business and law.

5. Latham & Watkins' preferred registrar for the transfer of the <hiring-lw.com> domain name is Safenames, LTD.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 23, 2018

Respectfully submitted,

LATHAM & WATKINS LLP

By /s/Bert C. Reiser

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CERTIFICATE OF SERVICE

I certify that on May 23, 2018 I caused a copy of the foregoing to be served on the following via U.S. Mail:

Perfect Privacy LLC
12808 Gran Bay Parkway West
Jacksonville, FL 32258

and via email upon:

5felv03raug3i88j53b2k4frj7@domaindiscreet.com

/s/Bert C. Reiser
Bert C. Reiser (VA Bar No. 31856)
bert.reiser@lw.com